

A2001-31
I-K-28



Denise Gerth

04/09/03 09:42 AM

To: Joann Allman/RTP/USEPA/US@EPA

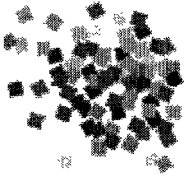
cc:

Subject: Re: NOx RACT Revision

docket stuff

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----- Forwarded by Denise Gerth/RTP/USEPA/US on 04/09/03 09:41 AM -----



Denise Gerth

04/03/03 02:48 PM

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Subject: Re: NOx RACT Revision

Art/Amy --

Lydia suggested the change in italics in the first paragraph below.

In addition, through the NOx SIP Call or other programs (e.g., new source review) States may have adopted control measures for specific NOx sources that equal or exceed RACT requirements. For these sources, States may choose to submit, as part of its NOx RACT SIP revision, documentation that the previously adopted control measure meets the RACT requirement, where applicable. Finally, in developing the NOx SIP Call, States may have considered control measures for sources not in the cap-and-trade program-or may consider additional sources in responding to the second phase of the NOx SIP Call. The EPA's NOx RACT guidance (NOx General Preamble at 57 FR 55625) encourages States to develop RACT programs that are based on "areawide average emission rates." Thus, States *can submit a demonstration as part of their RACT submittal showing that* the weighted average emission rate from sources in the nonattainment area subject to RACT-including sources reducing emissions to meet the NOx SIP Call requirements-meet RACT requirements..

As stated in section 3, above, we are proposing an alternative option for RACT under subpart 1. In this option, areas that are able to demonstrate attainment of the 8-hour standard as expeditiously as practicable with the control measures in their SIP would be considered as having met RACT.

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